

O'Tormey, Sean P (FAA)

From: Reaves, David (FAA)
Sent: Friday, October 22, 2021 4:45 PM
To: randers@skycrane.us
Cc: O'Tormey, Sean P (FAA)
Subject: Request for Information - Kona Drone Service LLC, (Docket FAA-2021-0921) - response required by November 4, 2021

Mr. Ray Anders
Kona Drone Service LLC
75-5503 Mamalahoa Highway
Holualoa, HI 96725

Mr. Anders:

This email is to inform you that the following information is required to continue processing your petition for exemption for Rantizo, LLC, Docket FAA-2021-0246. We request you provide the following information to us no later than November 4, 2021:

1. In your petition for exemption you state: "The proposed operation in this Petition for Exemption is similar in nature to those conducted by Rocoza, LLC, Exemption No. 18599..." Please clarify your reference to Exemption No. 18599, as our records show this is the Rosedale Ag Services, LLC exemption (Regulatory Docket No. FAA-2020-0232). Also, please note that Exemption No. 18599 was based on Exemption No. 18009. In Exemption No. 18009, Powers Flight Group provided a comprehensive aircrew training manual as part of their risk mitigation strategy.
2. Please provide a comprehensive training and certification program. Petitioners who have been issued similar grants of exemption (see Exemption No. 18009) have provided a comprehensive training and certification program. Your operator's training program should be a comprehensive training course tailored for the proposed operations that includes theory and practical components, a pilot theory exam, and supervised operational familiarization training on agricultural spraying. Additionally, the training program requirements should include examination, flight test, and continued periodic training.
3. Please provide the supporting documents listed in your petition for exemption. In your petition for exemption you state: "In support of this Petition for Exemption, KDS will submit the following associated UAS operating documents under separate cover:"
 - DJI AGRAS T-16 Operating Manual
 - DJI 2600W 4-Channel Intelligent Battery Charger User guide
 - KDS Flight Operations and Procedures Manual
 - KDS Operational Risk and Safety Manual
 - KDS Maintenance Log/proceduresWe do not have a record of receiving these documents.
4. On page 1 of your petition, you request to operate the DJI AGRAS T-16 at a maximum weight of 92.59 pounds. However, on page 19 of your petition, you state the max weight is 97.57 pounds. Please clarify this discrepancy.
5. On page 16 of your petition, you state: "KDS intends to conduct the proposed operations in accordance with Part 107." 14 CFR Part 107 is not applicable to UAS weighing 55 lbs or more. Please explain this discrepancy.

Please submit the additional information (non-proprietary) as a comment to your docket at www.regulations.gov, and save the tracking number generated after submission. Proprietary information may be submitted electronically to David Reaves at david.reaves@faa.gov and Sean O'Tormey at sean.p.o'tormey@faa.gov.

If you want us to process your request any further, we must receive the information described above by November 4, 2021. If we do not receive the information, we will close the docket without notifying you further. If you have any questions or require additional time you may email us or call 281-443-5862.

Sincerely,



David Reaves

Aviation Safety Inspector
Operations Group | AFS-830

Flight Standards Service
800 Independence Ave, SW
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